

**IN THE UNITED STATES DISTRICT COURT  
THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<p><b>S. JAIN, for herself, and as parent of and )</b>  <b>for her son “A”, a minor, )</b>    <b>Plaintiffs, )</b>    <b>vs. )</b>    <b>BUTLER ILLINOIS SCHOOL )</b>  <b>DISTRICT 53, )</b>    <b>Defendants. )</b>    <b>)</b></p>	<p><b>MOTION TO FILE DECLARATION</b>  <b>AS A SEALED, CONFIDENTIAL</b>  <b>DOCUMENT</b></p> <p><b>Case Number: 1:17-cv-00002</b>  <b>Hon. Ronald A. Guzman, U.S.D.J.</b>  <b>Hon. Sidney I. Schenkier, U.S. Mag.</b></p>
--	---

**MOTION TO FILE DECLARATION  
AS A SEALED, CONFIDENTIAL DOCUMENT**

I request leave to file my Declaration in support of my motion to withdraw as Plaintiffs' attorney, as a sealed, confidential document, which is not to be served on the Defendants because the contents involve privileged communications with Plaintiffs. It has been served on Plaintiffs.

I have asked Plaintiffs to state the reasons for their objections to my Withdrawal Motion both before and after it was filed, but I received no response. I have been told that Plaintiff, Dr. S. Jain, made serious accusations and criticisms of me when the Withdrawal Motion was first considered by the Court. I was not present then and had asked Local Counsel to speak for me if I was not granted leave to appear by telephone, which I wasn't.

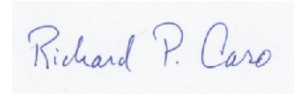
I have a right to defend myself but also seek to avoid the unnecessary disclosure to Defendants of privileged communications had with my clients. I do not believe that they have a right to disclosure of that information.

I, accordingly, request that My Declaration In Support of my Withdrawal Motion be

sealed and kept confidential, i.e., not disclosed to Defendants.

Respectfully submitted,

October 2, 2017

A handwritten signature in blue ink that reads "Richard P. Caro". The signature is written in a cursive, slightly slanted style.

---

Richard P. Caro, Esq.

[Rpc29@yahoo.com](mailto:Rpc29@yahoo.com)

312-561-4171, Cell 312-375-1415

CERTIFICATE OF SERVICE

Richard P. Caro hereby certifies that he did on October 2, 2017, serve the Plaintiffs' Motion for to file his Declaration in support of his Motion to Withdraw and Notice of Entry was given automatically to all parties by the Court and I have served Plaintiffs with this Motion by email and by First Class mail also on October 2, 2017, but the Declaration was served only on Plaintiff S. Jain:

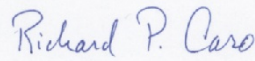
Matthew Henderson, Esq.  
Hinshaw & Culbertson LLP  
[mhenderson@hinshawlaw.com](mailto:mhenderson@hinshawlaw.com)

Lucy Bednarek, Atty.  
Ancel Glink Diamond Bush DiCianni & Krafthefer  
[Lbednarek@ancelglink.com](mailto:Lbednarek@ancelglink.com)

Nadern H. Elrabadi, Esq.  
Elrabadli Law, P.C.  
[nhe@elrabadilaw.com](mailto:nhe@elrabadilaw.com)

S. Jain  
[fedlawsuit@gmail.com](mailto:fedlawsuit@gmail.com) and  
104 Indian Train Road  
Oak Brook, IL 60523

Dated: October 2, 2017



---

Richard P. Caro  
[Rpc29@yahoo.com](mailto:Rpc29@yahoo.com)  
312-561-4171, Cell: 312-375-1415